

REMARKS

The claims have been divided into Group I including claims 1-25 and 50-52, and Group II including claims 26-49 and 53-55. The Examiner asserts that the claims of Group I are drawn to registering, creating and sending a multicast message for multiple destination distribution, while the claims of Group II are drawn to maintaining redundancy group binding table associated in contiguous regions interconnected by a local area network. Applicant respectfully asserts that the claims of Group II do not recite a local area network and do not recite contiguous regions.

It is also important to note that the claims of Group II are counterparts to the claims of Group I. Specifically, the claims of Group I relate to processing performed by an “active” Home Agent (e.g., the Home Agent that is registering a Mobile Node), while the claims of Group II relate to processing performed by a “passive” Home Agent. For instance, claim 14 of Group I recites receiving a multicast mobility binding table request from another Home Agent, while claim 26 of Group II recites sending a multicast mobility binding table request. Thus, the claims of both groups are closely related. Therefore, Applicant respectfully submits that the claims of Group I should be examined with the claims of Group II.

The restriction requirement states that the inventions of Groups I and II are distinct and independent from each other. More particularly, the Examiner asserts that neither requires the other for its implementation. Applicant respectfully traverses this assertion. As set forth above, many of the claims in Group I are counterparts to the claims in Group II. For instance, claims 19-20 of Group I recite sending a reply message, while claim 31 of Group II recites receiving one or more reply messages. Accordingly, Applicant respectfully submits that the claims of Group I should be examined with the claims of Group II.

Even if the claims are drawn to patentably distinct or independent inventions, MPEP § 803 provides that “[i]f the search and examination of an entire application can be made without serious burden, the examiner must examine it on the merits, even though it includes claims to distinct or independent inventions.” Although the scope of the claims of Groups I and II are patentably distinct, many of the claimed features are similar and direct counterparts to one another, as set forth above. Moreover, Applicant respectfully submits that each of the claims relates to implementing Home Agent redundancy. In order to implement Home Agent redundancy, the primary Home Agent performs various steps, while the passive Home Agent(s) also performs various steps. Accordingly, although it is acknowledged that the inventions of Groups I and II are patentably distinct, Applicant respectfully submits that it would not unduly burden the examiner to simultaneously examine the claims of Groups I and II.

Should the Examiner have any questions concerning this matter, the undersigned can be reached at the telephone number set out below.

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